

Michael K. Tuzzio Attorney ID. No. 038751983
RONAN, TUZZIO & GIANNONE
One Hovchild Plaza
4000 Route 66, Suite 231
Tinton Falls, NJ 07753
(732) 922-3300
Attorneys for Third-Party Defendant/Counter-claimant
PERFECT BODY & FENDER CO., INC.
File No. 101-11108 MKT

THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

AMA REALTY LLC,

Plaintiff/Counterclaim Defendant,

vs.

9440 FAIRVIEW AVENUE, LLC, JOSEPH
SANZARI, TIMOTHY MURRAY, JOSEPH
SANZARI, INC., NORTH BERGEN
ASPHALT, LLC, and TILCON NEW YORK,
INC.,

Defendant/Counterclaimant/
Third-Party Plaintiff,

vs.

MILLENNIUM RESOURCES RECOVERY,
LTD, PERFECT BODY & FENDER CO.,
INC., and JOHN DOES 1-5,

Third-Party Defendants.

CIVIL ACTION

DOCKET NO. 02:13-cv-00457

**THIRD-PARTY DEFENDANT PERFECT
BODY & FENDER CO., INC.'s
NOTICE OF MOTION IN LIMINE**

TO: Counsel of Record

PLEASE TAKE NOTICE that on such time and date as to be determined by the Court, the undersigned counsel for Third-Party Defendant Perfect Body & Fender Co., Inc. shall move before

the Honorable John Michael Vazquez, U.S.D.J., at the Martin Luther King Federal Building & U.S. Courthouse, Newark, New Jersey, for the entry of an Order limiting the testimony of Joseph M. Sullivan, P.E., C.B.I.E., the expert of Defendant/Counterclaimant/Third-Party Plaintiff, 9440 Fairview Avenue, LLC attributing any damage to the roof or to the Building to Third-Party Defendant Perfect Body & Fender Co., Inc. at the time of trial.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Third-Party Defendants shall rely upon their Certification of Counsel and Brief in Support of this Motion; and

____ PLEASE TAKE FURTHER NOTICE that a form of Order has been submitted herewith pursuant to the Rules of this Court; and

PLEASE TAKE FURTHER NOTICE that oral argument is requested on this matter.

RONAN TUZZIO & GIANNONE

Attorney for Third-Party Defendant

Perfect Body & Fender Co., Inc.

By: *s/Michael K. Tuzio*

Michael K. Tuzzio, Esq.

Dated: July 15, 2019